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9 Attorney for Plaintiff

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 JOSHUA E. LEMMENS,

13 Plaintiff,

14 v.

15 ANDREW SAUL,
16 COMMISSIONER OF SOCIAL SECURITY,

17 Defendant.

)
)
) CASE NO. 2:20-cv-00881
)
)
)

) **CONSENT MOTION**
) **FOR EXTENSION OF TIME TO FILE**
) **PLAINTIFF'S BRIEF**
)
)
)

18 Plaintiff, Joshua E. Lemmens, by his attorney, Hal Taylor, Esq., Of Counsel, Olinsky
19 Law Group, hereby moves for a sixty day extension of time to file Plaintiff's Opening Brief.
20 Plaintiff's opening brief is currently due to be filed May 13, 2021.

21 Due to the backlog of transcripts created by COVID-19 and the Commissioner's
22 response, the Commissioner is able to produce records at a rapid pace. As a result, this has
23 caused multiple, simultaneous filing deadlines that cannot be met by Plaintiff's Counsel. This,
24 prevents counsel from preparing a proper and meritorious brief. Plaintiff requests this time to
25 allow for review of the record and proper preparation of Plaintiff's Brief. Wherefore, Plaintiff
26 requests an extension from May 13, 2021 up to and including July 12, 2021 to file his brief.
27
28

1 Counsel for the Plaintiff has conferred with defendant's counsel who kindly has consented to this
2 request.

3 Dated this 11th day of May, 2021.

4 Respectfully submitted,

5 /s/Hal Taylor

6 Hal Taylor, Esq.

7 Of Counsel, Olinsky Law Group

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14 **ORDER**

15 **IT IS SO ORDERED**

16 **DATED:** 12:16 pm, May 14, 2021

17 

18 **BRENDA WEKSLER**

19 **UNITED STATES MAGISTRATE JUDGE**